

# **Exhibit B**

HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

DINAH CANADA, MARIE JOHNSON-  
PEREDO and ROBERT HEWSON on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

MERACORD, LLC; LINDA REMSBERG and  
CHARLES REMSBERG, individually and on  
behalf of the marital community; LLOYD E.  
WARD and AMANDA GLEN WARD,  
individually and on behalf of the marital  
community; LLOYD WARD, P.C.; LLOYD  
WARD & ASSOCIATES, P.C.; THE LLOYD  
WARD GROUP, P.C. (D/B/A LLOYD  
WARD GROUP II); WARD HOLDINGS,  
INC.; and SETTLEMENT COMPLIANCE  
COMMISSION, INC.,

Defendants.

NO. 3:12-CV-05657-BHS

**MERACORD DEFENDANTS' AMENDED  
RULE 68 OFFER OF JUDGMENT TO  
PLAINTIFF CANADA**

MERACORD DEFENDANTS' AMENDED RULE 68 OFFER OF  
JUDGMENT TO PLAINTIFF CANADA

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Pursuant to Federal Rule of Civil Procedure 68, Defendants Meracord LLC, Linda Remsberg, and Charles Remsberg (collectively, the "Meracord Defendants"), by and through their undersigned attorneys, hereby offer to allow judgment to be taken against them and in favor of Plaintiff Dinah Canada for the sum of \$37,608.00, plus pre- and post-judgment interest as authorized by law, reasonable attorneys' fees, costs, and expenses, in full satisfaction of all damages and relief sought by Ms. Canada on her individual claims in this action.

Pursuant to Fed. R. Civ. P. 68(d), if the judgment that Ms. Canada obtains is not more favorable than this unaccepted offer, Ms. Canada must pay costs incurred after this offer is made. This Offer of Judgment is made pursuant to Fed. R. Civ. P. 68 and is not to be construed as an admission of any liability on the part of the Meracord Defendants.

DATED this 5th day of May, 2013.

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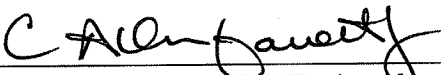
**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing upon all counsel of record by e-mail on May 5, 2013, and by depositing a true and correct copy thereof in the United States mail, first-class postage prepaid, on May 6, 2013, addressed as follows:

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